

**Docket # 03-QCTA-1**  
**California Climate Action Registry Rulemaking Proceeding**

First Environment, an approved provider of technical assistance and certification services to California Climate Action Registry participants, offers the following comments with respect to the California Energy Commission's proposed rule regarding Approval of Technical Assistance Providers and Certifiers for the California Climate Action Registry:

- The proposed rule identifies that proposals will be due not less than 30 days after the release of the RFA. To allow potential proposers to prepare to respond to the RFA, we encourage the CEC to allow 30 days of notice prior to the release of the RFA in addition to the 30-day response period.
- In general, we support the CEC's conflict of interest approach and encourage the CEC to maintain integrity of the Registry through a strict position on this issue.
- We would encourage the removal of the paradox associated with the notice of certification services. This notice requires detailed information that may be collected or confirmed during the kickoff meeting of the certification. The proposed rule states that the certifier may provide certification services ten working days after notice is received by the CEC. We suggest to allow the certifier to provide certification services when the COI determination is made but allow ten days after notice is made before any site visits are conducted. This will enable the certifier to provide more complete and accurate information for the notice.
- We encourage the CEC to add a provision that would simplify and streamline the re-approval process for certifiers. In addition, we encourage that re-approval should not be limited to the issue of an RFA but rather occur on a rolling basis.

In consideration of these comments and those of other organizations, we respectfully request the CEC postpone the adoption of the rule to allow further review so that these and other considerations can be appropriately addressed.

We appreciate this opportunity to provide these comments.

Respectfully Submitted,

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